

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Andrea Walters  
Timothy Walters**

**Debtor(s)**

**BK NO. 25-10949 AMC**

**Chapter 13**

**KeyBank, NA**

**Movant**

**Hearing Date: 05/06/2025**

**vs.**

**Andrea Walters  
Timothy Walters**

**Respondent(s)**

**OBJECTION OF KEYBANK, NA  
TO CONFIRMATION OF CHAPTER 13 PLAN**

KeyBank, NA (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. Secured Creditor intends to file a secured proof of claim setting forth pre-petition arrears in the amount of \$4,081.56 on or before the May 19, 2025 Bar Date.
2. Debtor's Plan provides for payment in the amount of \$1,690.52 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$2,391.04. and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, KeyBank, NA, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: March 28, 2025

By: /s/ Denise Carlon  
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